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April 14, 2025

Via ECF

Hon. John G. Koeltl U.S. District Court Southern District of New York 500 Pearl Street New York, New York 10007

APPLICATION GRANTED SO ORDERED

John G. Koeltl, U.S.D.J.

Re:

Chosen Figure LLC v. Wardrobe NYC LLC

Case No: 1:25-cv-00551-JGK

Dear Judge Koeltl:

This firm represents plaintiff Chosen Figure LLC ("Plaintiff") in the above-referenced matter and writes pursuant to Rule I.C. of the Court's Individual Practices, to respectfully request a brief extension of the deadline for Plaintiff to file a default judgment motion against defendant Wardrobe NYC LLC ("Defendant"), for an additional thirty (30) days, to May 16, 2025.

The reason for the request is that following the entry of default against Defendant [Dkt. No. 12], Plaintiff, via counsel, is diligently attempting to contact Defendant via e-mail and mail in the hopes of resolving this case and in an effort to avoid the waste of judicial resources, which would result from Defendant filing an appearance only after a motion for default judgment had been filed.

The original filing deadline is April 16, 2025 [Dkt. No. 13] and no previous requests have been made or granted/denied. Defendant is in default and therefore neither opposes nor consents to this request. Plaintiff respectfully requests this extension at a time when it can cause no harm or prejudice to any party or disruption to the Court's docket and will have no effect on any other existing deadlines.

Thank you for your consideration of this request.

Respectfully submitted,

SANDERS LAW GROUP

<u>/s Jaymie Sabilia-Heffert</u> Jaymie Sabilia-Heffert